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MAY 07 1992

92-RPA-148

President
Westinghouse Hanford Company
Richland, Washington



NEW DOUBLE SHELL TANK COMPLIANCE WITH INTERIM STATUS TANK STANDARDS & DANGEROUS WASTE REGULATORY REQUIREMENTS

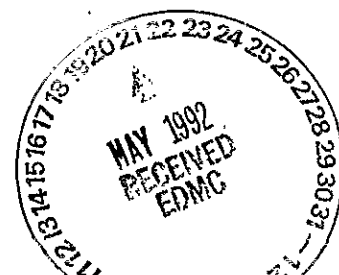
DOE Richland Field Office (RL) efforts to identify, plan and execute actions for near and long term resolution of environmental compliance problems are an important element in the overall management of environmental matters at the Hanford Site.

In order to be assured that the new double shell tanks will satisfy U.S. Environmental Protection Agency (EPA) hazardous waste and State of Washington Department of Ecology (Ecology) dangerous waste regulatory requirements, you are directed to prepare the following:

1. a formal Regulatory Compliance Analysis for the Design and Construction of the new double shell tanks; and
2. a Permitting Plan, developed pursuant to the requirements of the Project Management System, RLIP 4700.1A Chg 1, Chapter V, Section 2.i, which in pertinent part requires the following:

The permitting plan should identify all permits required to initiate/complete construction and start of operations. The information should be developed into a plan indicating constraints permits may have on project activities and responsibilities and schedule for obtaining permits. The plan should indicate how technical aspects of the project will be controlled in order to remain consistent with permit provisions and how changes to permits could be made if necessary. The plan should also include a method for regularly assessing compliance to the permit requirements through design, construction, and start up.

We believe that this action should be taken because: 1. concerns about new tank compliance with Interim Status technical standards and requirements were expressed by Ecology directly to RL representatives at the Tank Milestone negotiation meeting on April 7, 1991; and 2. concerns by staff members of the Office of Environmental Assurance, Permits, and Policy (EAP) that the FDC and CDR's do not adequately address compliance requirements or sufficiently describe the manner in which compliance will be achieved.



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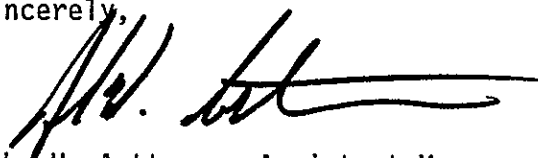
We regard EPA's and Ecology's concurrence on the suitability of the design, engineering, and construction program to be critical. In order to meet the planned schedule, we will have to begin construction under Interim Status. If we are to acquire the regulatory agencies agreement to proceed as planned, we will have to persuade them that we will meet Interim Status requirements. Ultimately, the facility will have to be permitted and Ecology will have authority to approve or deny the Final Status Permit. Without a Final Status Permit approval, we will not get to operate the tank system.

To the maximum extent possible, we want to be in a position of having anticipated issues early on. I believe that it is in our best interests to perform a comprehensive regulatory analysis, so that we may identify regulatory compliance issues, design and implement timely solutions and construct the double shell tanks appropriately. This type of activity was successfully utilized for the Grout Project. We must be prepared to address and be ready to negotiate and resolve regulatory concerns with proper coordination and planning.

I would appreciate it if you provided me with a schedule and plan of action for dealing with the issues associated with this matter by June 5, 1992. The Regulatory Analysis and Permitting Plan should contain a recommended negotiation strategy, complete with appropriate elements, comparative evaluation of alternatives, schedules, and plans of action, based upon the findings in the analyses.

The EAP and Treatment Projects Division (TPO) will provide you with any support, guidance and cooperation that you may require. Please contact Mr. Glenn R. Konzek, TPO on 376-8399 or Mr. Paul J. Krupin, EAP on 372-1112.

Sincerely,



John H. Anttonen, Assistant Manager
for Tank Waste Disposal

EAP:PJK

cc: R. E. Lerch, WHC
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